

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268-0001

MAIL PROCESSING NETWORK
RATIONALIZATION SERVICE CHANGES, 2012

Docket No. N2012-1

INTERROGATORIES OF THE AMERICAN POSTAL WORKERS UNION, AFL-CIO
TO USPS WITNESS CHERYL D. MARTIN
(APWU/USPS-T6-1-2)
(January 27, 2012)

Pursuant to Rules 25 through 28 of the Rules of Practice, American Postal Workers Union, AFL-CIO directs the following interrogatories to United States Postal Service witness Cheryl D. Martin (USPS-T-6). If the witness is unable to respond to any interrogatory, APWU requests that a response be provided by an appropriate person capable of providing an answer.

Instructions and Definitions applicable to these Interrogatories are contained in the Interrogatories of the American Postal Workers Union, AFL-CIO to the United States Postal Service witness David E. Williams (APWU/USPS-T1-1-4), filed on December 22, 2011, and are hereby incorporated by reference.

Respectfully submitted,

Darryl J. Anderson
Jennifer L. Wood
Counsel for American Postal Workers Union, AFL-CIO

APWU/USPS-T6-1 What is the estimated increase/reduction in operating miles of Plant to Plant and Plant to Post Office transportation due to the 2009-2011 consolidations? Please provide all data and supporting analyses used to determine the average percent reduction or increase.

APWU/USPS-T6-2 On page 13 of your testimony you state “[t]o the extent that HCRs can provide the needed transportation at a lower cost than PVS transportation, the Postal Service will save additional costs.” For the following HCR contracts please provide the: PS Form 7405, PS Form 7409, PS Form 4533, PS Form 5443 and the annual hours for each.

956L4	956L2	956L5	956L3
959A3	95934	95936	95938
95939	95948	95981	959L0
94690	45612B	320AG	320BG
320CG	320AK (A and B)	32015	32039
32132	32135	32136	32145
32146 (A and B)	32148	32169	321AA
321AE	321L0-A	321L0-B	321L2
328GE	27OU0	28634	28635
28636	28637	28647	28664
28667	28672	28680	286A1
286A5	286L0	286L1	286L3
541XX	53017	540L1	541A7
541L4	541A5	541CD	541L0
541L3	54110	54130	54131
54132	54133	54134	54136
54173	541L2	530BK (B)	53015
75196A	75393A	75395A	76315A
76331A	76332A	76333A	76334A
76335A	76336A	76365A	763AAA